

JAMIE LEONARD vs. ST. CHARLES COUNTY POLICE DEPARTMENT, et al
Deposition of JAMIE D. LEONARD, JR. taken on 8/22/19

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JAMIE LEONARD,)	
)	
Plaintiff,)	
v.)	No. 4:19-CV-00927
)	
ST. CHARLES COUNTY POLICE)	
DEPARTMENT, et al.,)	
)	
Defendants.)	

Deposition of
JAMIE D. LEONARD, JR.,
on Behalf of Defendants

August 22, 2019

Reported by
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<p style="text-align: right;">Page 58</p> <p>1 Q. -- fully and completely. 2 A. Yeah. 3 Q. You had said that you can no longer play softball 4 or golf. Did you play that prior to the injury? 5 A. I did, yeah. I played on -- well, I played golf. 6 I mean, I'd go to the driving range three, four days a week, 7 you know, and then golf once a week season, during the 8 season at least. When the money was good, I was golfing 9 three, four days a week because you'd invite your clients. 10 You know, that was -- 11 Softball, it wasn't as competitive. You know, it 12 was a men's league. But still, you know, I don't want to 13 catch a drive at third base and take the chance and say, 14 "Oh, well, that's how you lost your eye, dummy. You went 15 out on the softball field when you had one eye. You lost 16 your eye." You know, you never know. 17 So hockey, I played hockey for 14 years. I don't 18 know if I told you that, but can't play hockey anymore. If 19 I do, I got to put on a double cage if I even think about 20 playing hockey. But I don't want to do anything to, you 21 know, lose that -- lose my good eye, man. 22 Q. So as far as the medical expenses that you 23 incurred, do you have an estimate of how much you paid in 24 medical bills as a result of the injury to your eye? 25 A. It's all in the -- it's all in the report. My</p>	<p style="text-align: right;">Page 60</p> <p>1 A. I weigh 310 pounds I think right now. 2 Q. Would that have been about your approximate 3 height and weight back in '17? 4 A. Might have been a little lighter. 5 Q. Back in July of 2017? 6 A. Maybe, like, 10 pounds lighter, maybe. I don't 7 -- I really don't know, but I think I was working out more 8 consistently then so. 9 Q. Have you had any prior altercations with police 10 or law enforcement? 11 A. No. 12 Q. Other than this lawsuit, have you ever filed any 13 other kind of civil lawsuit? 14 A. I have not filed a lawsuit, no. 15 Q. Have you ever been the defendant in a lawsuit? 16 Have you ever been sued? 17 A. One real estate, it was a real estate civil suit. 18 Somebody sued my -- I was the broker and I was sued civilly 19 through -- the seller sued me because their house was 20 robbed. 21 It was out in Ferguson, Missouri. I don't why we 22 took the listing but we took it. All the copper got 23 stripped, and they sued me for negligence saying we left the 24 door unlocked. So I ended up settling that case. 25 Q. So did you end up paying the plaintiff in that?</p>
<p style="text-align: right;">Page 59</p> <p>1 attorney has taken care of that I think he said. 2 Q. Is there any further treatment for your eye 3 planned for the future? 4 A. Yeah, I have to -- my eye is sagging. Dr. 5 Custer, I was -- I'm going to meet with him actually next 6 month. And they're going to decide to either do another 7 surgery to lift my eye socket to lift my eyelid or they're 8 going to try to add more to the prosthetic to open the eye 9 up more. They don't know yet. 10 So he said, "At this point, you probably will 11 need future surgery." But I won't know until I meet him and 12 really have the discussion. 13 Q. And so other than what you described there, any 14 other future treatment that you're aware of? 15 A. No, just consistently meeting with the eye 16 doctor. 17 Q. You said you were offered a job as a bouncer; is 18 that correct? 19 A. Yeah, yeah, I was, yeah, yeah, just to work the 20 door and it's a buddy of mine, yeah, yeah. 21 Q. So just out of curiosity, how tall are you? 22 A. I am 6 8. 23 Q. All right. 24 A. Yeah. 25 Q. How much do you weigh?</p>	<p style="text-align: right;">Page 61</p> <p>1 A. I did actually. 2 WITNESS: Am I safe to say that you were my -- 3 MR. DONNER: Yeah, you can mention. I 4 represented him -- 5 WITNESS: Yeah. 6 MR. DONNER: -- in that transact -- 7 WITNESS: Yeah. 8 MR. DONNER: -- in that suit. 9 WITNESS: He helped me settle it, yeah. Yeah, I 10 did. 11 Q. (By Mr. Heffner) So I think that that about 12 does it for me. What I'd like to do is maybe take a quick 13 recess, let me go back, look at my notes -- 14 A. Uh-huh. 15 Q. -- and discuss it with Bryan and -- 16 A. Okay. 17 MR. HEFFNER: So we can go off the record. 18 (Brief recess.) 19 Q. (By Mr. Heffner) So we're back on the record. I 20 just have a few more questions and then we'll be done with 21 this. So you know that you talked about marijuana use. Had 22 you used any marijuana on July 19, 2017? 23 A. July 22 or July 19? 24 Q. July 19 so the morning of the incident in 25 Wentzville.</p>

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